



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

CRH:MAA/IC
F. #2017R00906

*271 Cadman Plaza East
Brooklyn, New York 11201*

May 1, 2023

By ECF and Email

The Honorable Pamela K. Chen
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Zhu Yong
Criminal Docket No. 21-265 (S-1) (PKC)

Dear Judge Chen:

The government respectfully submits this letter to correct an inadvertent misstatement in its April 27, 2023 opposition to defendant Zhu Yong's motion to suppress. (See Dkt. No. 183.) In its brief, the government stated that, following the defendant signing the waiver-of-rights form, he never mentioned an attorney during the more than two hours the interview lasted. (See id. at 7, 11.) However, at the end of the interview, the interviewing agents described to Zhu next steps in the legal process, including with respect to him meeting with an attorney. During that exchange, Zhu referenced – but still did not request – an attorney. Following this exchange, the defendant did not provide any substantive information, and the interview ended shortly thereafter.

The government respectfully submits that the defendant's additional statements do not affect the underlying analysis. It remains the case that at no point did Zhu clearly and

unambiguously invoke his right to an attorney, and accordingly Zhu's motion to suppress should be denied.

Very truly yours,

BREON PEACE
United States Attorney

By: /s/
Craig R. Heeren
Meredith A. Arfa
Irisa Chen
Assistant U.S. Attorneys
(718) 254-7000

cc: Clerk of Court (PKC) (By ECF and Email)
Counsel of Record (By ECF)